

### AMENDMENTS TO THE DRAWINGS

The attached sheets of drawings include changes to Figures 1-13. These sheets, which include Figures 1-13, replace the original sheets including Figures 1-13. In Figures 1-13 the drafting centerlines have been deleted. Additionally, the caption "Prior Art" has been added to Figures 1-3, and Figures 2 and 7 have been amended to use hidden lines to show the overlapping of plate tongues 1010, 1011, and 1012.

Also enclosed are annotated sheets where amendments to the replacement drawings relative to the original drawings have been noted.

Attachment: Five (5) Replacement Sheets

Five (5) Annotated Sheets Showing Changes

### **REMARKS**

The Office Action, mailed October 11, 2007, objected to claim 14, rejected claims 9-16 under 35 U.S.C. § 112, second paragraph, and 35 U.S.C. § 102.<sup>1</sup> In light of the foregoing amendments and the following remarks, reconsideration and allowance for the above-identified application are now respectfully requested. Claims 9-16 are pending.

#### **Amendments to the Drawings**

The Office Action objected to Figures 1-13 for various reasons. Applicant has hereby amended Figures 1-13 according to the Examiner's suggestions in the Office Action. In particular, Figures 1-13 have been amended to delete the drafting centerlines. Figures 2 and 7 have also been amended to use hidden lines to show the overlapping of plate tongues 1010, 1011, and 1012. Finally, Figures 1-3 have been amended to include the caption "Prior Art." Therefore, Applicant submits that the objections to the drawings have been overcome, and thus respectfully requests withdrawal of the objections to the drawings.

#### **Amendments to the Specification**

The Office Action objected to paragraphs [0026] and [0027] of the specification as not complying with the suggested content for the Brief Description of the Drawings section of the specification. Applicant has hereby deleted paragraphs [0026] and [0027] from the Brief Description of the Drawings section of the specification and added the contents of deleted

---

<sup>1</sup> Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

paragraphs [0026] and [0027] to the Detailed Description section of the specification. Therefore, Applicant respectfully requests removal of the objection to the specification.

### **Claim Objections**

The Office Action objected to claim 14, asserting that the recitation of "the hole of the lock plate" should recite "second hole in the lock plate." Applicant respectfully disagrees. Independent claim 9, from which claim 14 depends, recites "an eccentric lock cam ... being inserted through a first hole and a second hole, and into a third hole, wherein ... the first hole and the third hole are formed in the lock shell, and the second hole is formed in the lock plate." It is readily apparent that claim 9 merely refers to the holes as "first," "second," and "third" to identify the number and order of the holes through which the eccentric lock cam is inserted. The reference to the "second hole" does not refer to the number of holes formed in the lock plate. Therefore, the recitation in claim 14 of "a flange on the hole of the lock plate" clearly refers to the only hole in the lock plate identified in claims 9 and 14. Therefore, Applicant respectfully requests withdrawal of the objection to claim 14.

### **Claim Rejections under 35 U.S.C. §112**

The Office Action rejected claims 9-16 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Office Action also rejected claims 9-16 under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential structural cooperative relationships of elements.

Applicant has hereby amended claims 9 to more definitely define the invention and provide clarification regarding the structural relationship of the claimed elements. In particular, claim 9 has been amended to recited "wherein the eccentric cam on the eccentric lock cam and the stop tooth on the lock plate constitute a stop structure, such that when the eccentric lock cam is rotated within the first, second, and third holes, the eccentric cam engages the stop tooth, thereby limiting rotation of the eccentric lock cam and movement of the lock plate relative to the lock shell."

With regard to the rejection of claims 10-15, Applicant respectfully submits that the claims are complete and contain sufficient structural and/or functional relationship among the various elements of the claims. Specifically, it "is not essential to a patentable combination that there be interdependency between the elements of the claimed device or that all the elements operate concurrently toward the desired result." M.P.E.P. § 2172.01. Additionally, a claim "does not necessarily fail to comply with 35 U.S.C. 112, second paragraph where the various elements do not function simultaneously, are not directly functionally related, do not directly intercooperate, and/or serve independent purposes." *Id.* Therefore, it is not necessary to recite all of the structural and/or functional relationships between all the elements of the claims. Thus Applicant submits that Claims 10-15 provide sufficient interrelationship between the various elements of the claims. In particular, each of claims 10-15 recites a structural and/or functional relationship between the elements of the claims as follows:

- claim 10 recites "a barrier tooth on the lock plate;"
- claim 11 recites "a first rectangular hole is formed on an upper surface of the lock shell;"

- claim 12 recites "a second rectangular hole is formed on an upper side of the lock shell;"
- claim 13 recites "a flange strip disposed on an internal surface of a bottom side of the lock shell;"
- claim 14 recites "a flange on the hole of the lock plate;"
- claim 15 recites "the back end of the lock plate is bent into a U-shaped half-loop having an end surface that is a planar;"
- claim 16 recites "a wedged bulge disposed on the lock plate."

Therefore, Applicant respectfully requests that the rejection under 35 U.S.C. § 112, second paragraph, to claims 9-16 be withdrawn.

**Claim Rejections under 35 U.S.C. §102.**

The Office Action rejected claims 9-16 under 35 U.S.C. § 102(b) as being anticipated by Applicant's Admitted Prior Art (Figures 1-3). Applicant respectfully disagrees.

As amended herein, claim 9 recites, among other things, "a stop tooth disposed on the lock plate; and an eccentric lock cam, having an eccentric cam and a quincunx hole to facilitate rotation of the eccentric lock cam, ... wherein the eccentric cam on the eccentric lock cam and the stop tooth on the lock plate constitute a stop structure, such that when the eccentric lock cam is rotated within the first, second, and third holes, the eccentric cam engages the stop tooth, thereby limiting rotation of the eccentric lock cam and movement of the lock plate relative to the lock shell."

The Office Action asserts that element A in the reprinted version of Figure 1 is a stop tooth disposed on the lock plate. Office Action, page 9. Applicant respectfully notes, however,

that the description relating to Figures 1-3 does not identify, describe, or even refer to element A. Additionally, Figures 1-3 do not provide any indication that element A is structurally or functionally the same as the stop tooth recited in claim 9. For example, neither Figures 1-3, nor the discussion related to Figures 1-3, indicate that element A can engage the eccentric cam to limit the rotation of the eccentric lock cam and movement of the lock plate relative to the lock shell. Moreover, claim 9 has been amended to recite "an eccentric lock cam, having ... a quincunx hole to facilitate rotation of the eccentric lock cam." Figures 1-3 and the description relating thereto do not disclose a quincunx hole that facilitates rotation of the eccentric lock cam. For at least the foregoing reasons, Applicant submits that Figures 1-3 do not disclose or obviate claim 9. Applicant, therefore, respectfully requests withdrawal of the rejection under 35 U.S.C. 102(b) of claim 9.

Claims 10-16 depend from claim 9, and thus incorporate the limitations recited therein. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. 102(b) of claims 10-16 be withdrawn.

## CONCLUSION

Applicant respectfully submits, therefore, that the present application is now in condition for allowance. In the event that the Examiner finds any remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 29<sup>th</sup> day of February, 2008.

Respectfully submitted,

/J. Dustin Howell/ Reg. # 60701  
J. DUSTIN HOWELL

Registration No. 60,701  
Attorney for Applicant  
Customer No. 022913  
Telephone No. 801.533.9800

MMB:JDH  
DH0000000514V001